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*Attorneys for Defendants*  
*Clark County School District and*  
*Kemala Washington*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JOHN and JOANN DOE, parents and natural  
guardians of JANE DOE, a minor,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT;  
CLARK COUNTY EDUCATION  
ASSOCIATION; DARRYL L.  
LANCASTER; KEMALA WASHINGTON,

Defendants.

CASE NO. 2:24-cv-00284-GMN-BNW

**JOINT MOTION TO EXTEND  
DEADLINE FOR CLARK COUNTY  
SCHOOL DISTRICT AND KEMALA  
WASHINGTON TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)**

Plaintiffs, John and Joanne Doe, parents and natural guardians of Jane Doe, a minor (Plaintiffs), and Defendants Clark County School District (CCSD) and Kemala Washington (Washington), collectively the “Moving Parties”, by and through their undersigned counsel, for good cause shown, hereby move the Court for an extension of time for Defendants CCSD and Washington to respond to Plaintiffs’ Complaint (ECF No. 1), up to and including February 26, 2024:

1. Defendants CCSD and Washington, Defendant Clark County Education Association (CCEA), and Defendant Lancaster jointly removed this action on February 9, 2024

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(ECF No. 1), making February 16, 2024, the deadline for Defendants to answer or otherwise respond to the Complaint. FRCP 81(c)(2)(C).

2. Defendants CCSD and Washington require additional time to respond to the Complaint.

3. On February 15, 2024, Defendant CCEA and Plaintiffs filed a similar Joint Motion to Extend Deadline for Defendant CCEA to Respond to Complaint, agreeing to extend Defendant CCEA's deadline to respond to the Complaint to February 26, 2024. (ECF No. 8).

4. The Moving Parties therefore agree to extend the time for Defendants CCSD and Washington to answer or otherwise respond to the Complaint by 10 days up to and including February 26, 2024.

5. This request is not made for purposes of delay and is supported by good cause.

Dated: February 16, 2024.

Dated: February 16, 2024.

PRINCE LAW GROUP

OLSON CANNON & GORMLEY

By: /s/ Colin P. Cavanaugh  
Dennis M. Prince, Esq. (#5092)  
Colin P. Cavanaugh, Esq. (#13842)  
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*Attorneys for Plaintiffs*

By: /s/ Stephanie A. Barker  
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*Attorneys for Defendants  
Clark County School District and  
Kemala Washington*

### ORDER

Good cause appearing, the foregoing Joint Motion is hereby **GRANTED**. Defendant CCSD's and Defendant Washington's deadline to answer or otherwise respond to the Complaint (ECF No. 1) is extended up to and including February 26, 2024.

IT IS SO ORDERED.

DATED: 2/20/2024

  
UNITED STATES MAGISTRATE JUDGE

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10 day of February, 2024, I served the above and foregoing JOINT MOTION TO EXTEND DEADLINE FOR CLARK COUNTY SCHOOL DISTRICT AND KEMALA WASHINGTON TO RESPOND TO COMPLAINT (FIRST REQUEST), through the CM/ECF system of the United States District Court for the District of Nevada (or if necessary, by electronic mail delivery and by U.S. Mail, first class, postage pre-paid), upon the following:

Dennis M. Prince, Esq.  
Colin P. Cavanaugh, Esq.  
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Las Vegas, NV. 89148  
*Attorneys for Plaintiffs*

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County Education Association*

Andrew M. Leavitt, Esq.  
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*Attorney for Defendant Lancaster*

  
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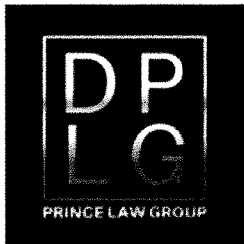
## Nan Langenderfer

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**From:** Colin Cavanaugh <ccavanaugh@thedplg.com>  
**Sent:** Friday, February 16, 2024 3:40 PM  
**To:** Stephanie Barker  
**Cc:** Nan Langenderfer; Dennis Prince; Lisa Lee; Amy Ebinger; Amy Larsen  
**Subject:** RE: DOE v. CCSD, CCEA, Washington & Lancaster

Hi Stephanie,

We are agreeable to the same 10-day extension granted to the other defendants. With that change, it should be good to go. Thanks,



**Colin Cavanaugh | Attorney**  
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**From:** Stephanie Barker <sbarker@ocgas.com>  
**Sent:** Friday, February 16, 2024 3:05 PM  
**To:** Colin Cavanaugh <ccavanaugh@thedplg.com>  
**Cc:** Nan Langenderfer <nlangenderfer@ocgas.com>  
**Subject:** DOE v. CCSD, CCEA, Washington & Lancaster

Good Afternoon Colin:

In follow up to our phone conversation this morning, attached is a proposed Joint Motion to Extend the time for Defendants CCSD and Washington to respond to the Complaint.

Please advise as to whether you would like changes or, in the alternative, if we have authorization to submit the Joint Motion with your electronic signature.

Thank you for your professional courtesy in this matter.

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